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Hobart Brothers Co., Hobart Brothers Company, ITW Food  
Equipment Group LLC and Tri-Mark, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:	<b>Chapter 11</b>
<b>DELPHI CORPORATION, et al.,</b>	:	<b>Case No.05-44481 (RDD)</b>
	:	<b>(Jointly Administered)</b>
<b>Debtors.</b>	:	
	:	<b>March 15, 2010</b>

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**EXPEDITED MOTION OF ILLINOIS TOOL WORKS, INC. AND ITW  
FOOD EQUIPMENT GROUP LLC FOR: (i) AN EXTENSION  
OF TIME TO FILE A SUPPLEMENTAL RESPONSE  
TO REORGANIZED DEBTORS' SUPPLEMENTAL REPLY;  
AND (ii) A CONTINUANCE OF THE HEARING SCHEDULED FOR MARCH 18, 2010**

Illinois Tool Works, Inc. and ITW Food Equipment Group LLC (collectively "ITW"),  
by and through its undersigned counsel, hereby requests an extension of time to file a  
supplemental response to the Reorganized Debtors' Supplemental Reply to Responses of  
Certain Claimants to Debtors' Objections to Proofs of Claim Nos. 11983, 11985, 11988 and  
11989 (the "Supplemental Reply") and for a continuance of the hearing scheduled for March  
18, 2010 in this matter. In support thereof, ITW avers as follows:

1. On July 26, 2006, ITW filed Claim Nos. 11985 and 11988 against Delphi Corporation (“Delphi”) and Claim Nos. 11983 and 11989 against Delphi Automotive Systems, LLC (“DAS”) (collectively, the “Claims”).

2. On or about October 31, 2006, the Delphi and DAS (collectively, the “Debtors”) filed the Debtors’ (I) Third Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Claims With Insufficient Documentation; (B) Claims Unsubstantiated By Debtors’ Books and Records, and (C) Claims Subject To Modification And (II) Motion To Estimate Contingent and Unliquidated Claims Pursuant To 11 U.S.C. § 502(c) (the “Third Omnibus Claims Objection”).

3. On November 21, 2006, ITW filed the Response of Creditors: (i) Illinois Tool Works Inc.; (ii) Illinois Tool Works For Hobart Brothers Co., (iii) Hobart Brothers Company, (iv) ITW Food Equipment Group LLC and (v) Tri-Mark, Inc. In Opposition To Debtors’ Third Omnibus Objection To Certain Claims (the “Response”).

4. On or about February 18, 2010, the Debtors filed a Notice of Sufficiency Hearing with Respect to Debtors’ Objections to Proofs of Claim Nos. 6991, 7054, 9221, 10830, 10959, 120960, 11375, 11643, 11644, 11892, 11911, 11983, 11985, 11988, 11989, 12147, 12833, 13776, 13881, 14019, 14020, 14022, 14023, 14024, 14025, 14026, 14370, 14825, 14826, 16967, 18265, 18422, 18603, 18614, 19162, 19543, and 19545 (the “Sufficiency Hearing Notice”).

5. Pursuant to the Sufficiency Hearing Notice, a hearing on the Debtors’ objection to the ITW Claims has been scheduled for March 18, 2010 at 10:00 a.m..

6. On March 9, 2010, ITW received the Debtors' Supplemental Reply to the ITW's Claims.

7. Pursuant to Section 9(b)(ii) of the Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, and 9014 Establishing (I) Dates For Hearings Regarding Objections To Claims And (II) Certain Notices and Procedures Governing Objections to Claims (the "Order"), ITW has until March 16, 2010 to file its own supplemental response to the Debtors' Supplemental Reply.

8. On March 12, 2010, the undersigned requested a one-week extension of time from Debtors' counsel to file its responsive pleading and a continuance of the March 18<sup>th</sup> hearing date. The undersigned indicated that she requires additional time to properly evaluate the assertions made by the Debtors in their Supplemental Reply and draft and file a responsive pleading due to an extremely burdensome schedule.

9. Debtors' counsel has refused to grant ITW's brief extension of time citing the Debtors' sensitivity to fees incurred in this case and the Debtors' desire to resolve the outstanding claims' objections as soon as possible.

10. ITW cannot fathom how a brief extension of time will cause the Debtors to incur additional substantial legal fees in these cases, particularly when hundreds of millions of dollars have already been spent on professional fees. Moreover, it is believed that hundreds of claims have yet to be adjudicated and the Debtors will likely need to appear before this Court in the near future and can address ITW's Claims at the next scheduled claims' hearing.

11. Finally, the Debtors will not be prejudiced as a result of a brief delay as the Debtors' Objection to ITW's Claims has been pending for well over three-and-a-half

(3-1/2) years and ITW has only had the benefit of the Debtors' Supplemental Reply for six (6) days.

WHEREFORE, ITW respectfully requests a brief extension of time to file its supplemental response to the Reorganized Debtors' Supplemental Reply and a continuance of the hearing scheduled for March 18, 2010, and for such other and further relief as is necessary and just.

Illinois Tool Works Inc., Illinois Tool Works  
for Hobart Brothers Co., Hobart Brothers  
Company, ITW Food Equipment Group LLC  
and Tri-Mark, Inc.

By: /s/ Kristin B. Mayhew  
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Their Attorneys

**CERTIFICATE OF SERVICE**

I, Kristin B. Mayhew, hereby certify that on this 15<sup>th</sup> day of March, 2010, the foregoing Expedited Motion Of Illinois Tool Works Inc. And ITW Food Equipment Group LLC For: (i) An Extension Of Time To File A Supplemental Response To Reorganized Debtors' Supplemental Reply; And (ii) A Continuance Of The Hearing Scheduled For March 18, 2010 was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic notification system (CM/ECF). Additionally, other parties may access this filing through the Court's electronic system.

/s/ Kristin B. Mayhew  
Kristin B. Mayhew (ct20896)